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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

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TRUDY ASHLEY,

Plaintiff,

v.

FAMILY HERITAGE LIFE INSURANCE  
COMPANY OF AMERICA,

Defendant,

Case No:

**CIV 12 - 285 - RAW**

**FILED**

JUN 27 2012

WILLIAM B. GUTHRIE  
Clerk, U.S. District Court  
By Deputy Clerk

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**NOTICE OF REMOVAL**

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Defendant, Family Heritage Life Insurance Company of America, pursuant to 28 U.S.C. §§1441(b) and 1446, submits the following Notice of Removal:

Defendant removes this case on the grounds that this Court has original jurisdiction of this action, pursuant to 28 U.S.C. §1332. As set forth in the final paragraph of Plaintiff's Petition, the amount in controversy exceeds \$75,000.00. Further, the action is between citizens of different states. Plaintiff is a citizen of Oklahoma. Defendant is an Ohio corporation, with its principal place of business in Broadview Heights, Ohio. Pursuant to 28 U.S.C. §1446(a) and LCvR 81.2, Defendant has attached

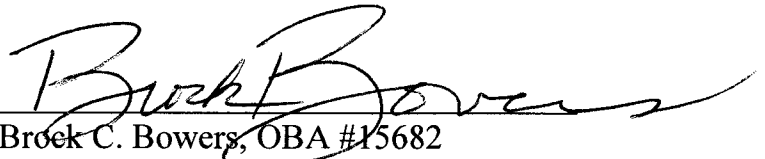
as Exhibit 1 a copy of the process and pleadings served upon Defendant. Defendant was served by mail on June 7, 2012, so this removal is timely.

In compliance with LCvR 81.2, Defendant has attached as Exhibit 2 a copy of the state court docket sheet for the state court action filed in Okfuskee County, Oklahoma.

In compliance with LCvR 81.1, Defendant has filed, contemporaneous with this Notice of Removal, a Demand for Jury Trial.

WHEREFORE, Defendant, Family Heritage Life Insurance Company of America, by and through its attorney, Brock C. Bowers of Hiltgen & Brewer, P.C., requests that the this case be removed from the District Court of Okfuskee County, State of Oklahoma, to the United States District Court for the Eastern District of Oklahoma.

Respectfully submitted,



Brock C. Bowers, OBA #15682

HILTGEN & BREWER, P.C.

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**ATTORNEY FOR DEFENDANT  
FAMILY HERITAGE LIFE INSURANCE  
COMPANY OF AMERICA**

**CERTIFICATE OF SERVICE**

This is to certify that on this 26<sup>th</sup> day of June, 2012, a true and correct copy of the above and foregoing was sent via electronic mail to the following:

Rick W. Bisher, [OBA #12215]  
Ryan Bisher Ryan Phillips & Simons  
4323 NW 63rd Street, Suite 110  
Oklahoma City, OK 73116  
PHONE NO: (405)528-4567  
FAX: (405)525-2123  
E-MAIL: [rbisher@rbirlawfirm.com](mailto:rbisher@rbirlawfirm.com)

**ATTORNEY FOR PLAINTIFF**

  
Brock C. Bowers